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GSA Office of Governmentwide Policy

JUL 11 2008

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Mr. Dan G. Blair
Chairman
Postal Regulatory Commission
901 New York Avenue, NW
Washington, DC 20268-0001

Dear Mr. Blair:

Thank you very much for the opportunity to respond to your request for comments on universal postal service and the postal monopoly, which you issued as a Notice and Order under Docket No. PI2008-3 on April 18, 2008, and was published in the Federal Register on April 30, 2008.

Under the authority given to the General Services Administration (GSA) through the Federal Records Act (44 U.S.C. 2901-2904), the GSA Office of Governmentwide Policy (OGP) provides policy on mail management to Federal agencies. As part of this role, OGP represents all Federal agencies to the United States Postal Service (USPS) in general and, specifically, on the Postmaster General's Mailers Technical Advisory Committee.

We solicited input from the larger Federal agencies on this Docket, and this letter represents their consolidated comments. These comments are enclosed in the form of responses to the numbered topics identified for comment.

We look forward with interest to the report on universal postal service and the postal monopoly in the United States that you are planning to send to the President and Congress at the end of this year. Please feel free to call me on (202) 501-0563 if you would like to discuss this letter. Staff inquiries may be directed to Mr. Henry Maury on (202) 208-7928.

Sincerely,

Kevin Messner
Acting Associate Administrator

Enclosure

U.S. General Services Administration
1800 F Street, NW
Washington, DC 20405-0002
www.gsa.gov

Federal Agency Comments
Postal Regulatory Commission Docket No. PI2008-3
Universal Postal Service and the Postal Monopoly in the United States
June 9, 2008

Topic No. 1: "Scope of "Universal Postal Service" and "Universal Service Obligation (USO)"

Comment: We agree with the working definition of universal service proposed under this topic. All six aspects of this definition are very critical concerns for Federal agencies because each one enables our communications with American citizens across the United States and abroad.

Topic No. 2: Historical Development of Universal Service, the USO and Monopoly Laws

Comment: One question raised under this topic asks: "What has been the effect of the Internet on demand?" Federal agencies are making increasing use of the Internet to communicate with citizens, in terms of providing information and collecting input. However, Federal agencies will continue to need mail for these purposes for the foreseeable future.

Topic No. 3: Geographic Scope

Comment: We are not aware of any geographic areas that are not being served, or being served inadequately, by the current USO.

Topic No. 4: Universal Service: Range of Product Offerings

Comment: Federal agencies use all of the postal products discussed under this topic, and we expect to need to continue using them for the foreseeable future. We would mention, in particular, that Federal law continues to require use of registered mail for certain types of official correspondence. Also, most mail sent by Federal agencies is first class, and thus we are especially interested in seeing that first class mail continue to be a fully-supported product under the USO.

Topic No. 5: Universal Service: Access to Postal Facilities and Services

Comment: We expect that citizens will continue to need to use the full range of facilities for depositing mail for the foreseeable future. Certainly, in this context, "the foreseeable future" includes the next 10 years, and it probably extends well beyond that for Federal agencies.

Topic No. 6: Universal Service: Frequency of Delivery

Comment: If real savings can be demonstrated from relatively small reductions in frequency of delivery, Federal agencies and the citizens with whom they communicate probably can adjust without severe difficulty. For the foreseeable future, however, it will be critical that Federal agencies retain the ability to send first class mail to citizens with some certainty that it will be delivered within time frames that are close to the current standards. We would also note that some Federal agencies have a critical need for Saturday delivery to their facilities.

Topic No. 7: Universal Service Obligation: Rates and Affordability of Service

Comment: Postage rates must continue to be as affordable as possible because Federal agencies' budgets will be subject to significant restrictions for the foreseeable future. The current statute uses the Consumer Price Index to limit increase in the rates for market dominant postal products. We recognize that this limit may not be viable over the long term, as the USPS's revenue continues to shift in response to market forces.

Topic No. 8: Quality of Service

Comment: We have no comment on the specific questions posed under this topic. We note that the USPS is currently providing the highest level of quality in its history, and we would hope that the USPS will continue to raise the quality level even higher. Any major decrease in quality levels would be a very serious concern.

Topic No. 9: Methods of Calculating the Cost of the Universal Service Obligation and Postal Monopoly

No Comment.

Topic No. 10: The Implications of the Universal Service Obligation for the Postal and Mailbox Monopolies

No Comment.

Topic No. 11: Universal Service, the Universal Service Obligation and the Postal Monopoly in Other Countries

No Comment.

Topic No. 12: Other Issues

No Comment.